

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

ALFRED JONES  
1505 Danton Lane  
Bowie, Maryland 20721

Plaintiff :

v. :

Case No.:

WASHINGTON METROPOLITAN  
AREA TRANSIT AUTHORITY  
Serve: General Counsel  
600 5<sup>th</sup> Street, N.W.  
Washington, DC 20001

and :

OLTHEA WEST  
617 Goldleaf Avenue  
Capitol Heights, Maryland 20743

Defendants :

COMPLAINT

Plaintiff, Alfred Jones, by his attorney, Christine H. Murphy, hereby file suit against the Defendants, Washington Metropolitan Area Transit Authority, hereinafter referred to as WMATA, and Olthea West, and for reasons, states as follows:

INTRODUCTION

1. On or about April 7, 2023, Plaintiff, Alfred Jones, was an operator of a vehicle traveling on Allentown Road at or near Taylor Manor Avenue.
2. At that same time and place, a Metro Access Van driven by the Defendant, Olthea West, who at all times relevant herein was the agent, servant and/or employee of Defendant, WMATA, the owner of said vehicle, swerved into the driver's side of Plaintiff's vehicle causing the Plaintiff to hit the wall.

3. At all times relevant herein, the Plaintiff, Alfred Jones, was exercising due care, and was free of negligence.

COUNT I

4. Plaintiff, Alfred Jones, realleges the facts and allegations set forth in the Introduction, and further states as follows:

5. The negligence of the Defendant, Olthea West, was the proximate cause of the accident in that said Defendant negligently failed to yield the right-of-way, negligently failed to keep proper control of her vehicle, negligently failed to keep a proper lookout for other vehicles, negligently merged into Plaintiff's lane when it was unsafe to do so, and was otherwise careless and negligent, thereby causing a collision with the motor vehicle owned and operated by the Plaintiff.

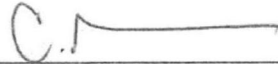
6. The negligence of the Defendant, WMATA, was a proximate cause of the accident in that said Defendant negligently entrusted their vehicle and/or allowed access to their vehicle to Defendant, Olthea West.

7. As a result of the negligence of said Defendant, Plaintiff did suffer great pain and permanent injury, mental anguish, loss of income, and has incurred and in the future will incur medical expense.

WHEREFORE, Plaintiff, Alfred Jones, demands judgment against said Defendant in a sum over and above Seventy-Five Thousand Dollars (\$75,000.00).

3

THE JAKLITSCH LAW GROUP

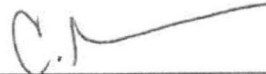


Christine H. Murphy  
CPF#: 0512140302  
Attorney for Plaintiff  
14350 Old Marlboro Pike  
Upper Marlboro, Maryland 20772  
(301) 627-8700  
(301) 627-6070 fax  
[christine@thejaklitschlawgroup.com](mailto:christine@thejaklitschlawgroup.com)

/bkb

DEMAND FOR JURY TRIAL

Plaintiff demands Trial by Jury on all issues herein.



Christine H. Murphy

/bkb